



June 15, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **Forbearance Petition of XO Communications, et al., WC Docket No. 05-170**

Pursuant to Section 1.1206 of the Commission's rules, COMPTEL hereby gives notice that on June 14, 2006, it met with Commissioner Copps and Scott Deutchman, Legal Advisor to Commissioner Copps with regard to the above-referenced forbearance petition. COMPTEL urged the Commission to grant the forbearance petition. COMPTEL specifically encouraged the Commission to forbear from enforcing its cumbersome "eligibility" restrictions, adopted in 2003, to prevent "stand-alone" IXC's and wireless carriers from using UNE combinations to provide exclusively long-distance or mobile wireless services. While COMPTEL has never agreed that any "use" or "eligibility" restrictions are an appropriate public policy, the massive consolidation in the industry over the past 3 years has eliminated even the ostensible justification for these restrictions. The BOCs, themselves, are the biggest IXC's and the biggest CMRS providers by far. Any continuation of these burdensome, architecturally-biased, restrictions will simply serve to perpetuate discrimination against the few remaining competitors to the Bells.

Representing COMPTEL were Russell Merbeth of Eschelon Telecom, and the undersigned attorney.

Respectfully submitted,

A handwritten signature in black ink, reading 'Jonathan D. Lee'. The signature is fluid and cursive, with the first name 'Jonathan' being more prominent than the last name 'Lee'.

Jonathan Lee
Sr. Vice President

Regulatory Affairs